

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875
THIS DOCUMENT RELATES TO ALL CASES	HON. ROBERT B. KUGLER CIVIL NO. 19-2875 (RBK)(KMW)

**CERTIFICATION OF JOHN R. DAVIS IN SUPPORT OF *DAUBERT*
MOTION TO EXCLUDE OPINIONS OF WAYNE GIBSON**

I John R. Davis, certify as follows:

1. My name is John R. Davis. I am an attorney at law in Austin, Texas, and a partner with the law firm of Slack Davis Sanger, LLP, and serve as Court-appointed Plaintiffs' Executive Committee ("PEC") counsel. I am fully familiar with the facts and circumstances of these actions. I make this Certification in support of Plaintiffs' Motion to Exclude Testimony of Mylan Expert Eric Sheinin, Ph.D.
2. Attached hereto as **Exhibit 1** is a true and correct copy of Mr. Gibson's July 27, 2023 Expert Report, marked as Exhibit 2 to his Sept. 20, 2023 deposition.
3. Attached hereto as **Exhibit 2** is a true and correct copy of Mr. Gibson's Dec. 29, 2023 Supplemental Expert Report, marked as Exhibit 11 to his Feb. 5, 2024 deposition.
4. Attached hereto as **Exhibit 3** is a true and correct copy of certain excerpts of Mr. Gibson's Sept. 20, 2023 deposition.

5. Attached hereto as **Exhibit 4** is a true and correct copy of certain excerpts of Mr. Gibson's February 5, 2024 deposition.
6. Attached hereto as **Exhibit 5** is a true and correct copy of Walgreen's December 22, 2023 Responses and Objections to Plaintiffs' First Set of Interrogatories.
7. Attached hereto as **Exhibit 6** is a true and correct copy of certain excerpts of the February 1, 2024 deposition of Dr. Rena Conti.
8. Attached hereto as **Exhibit 7** is a true and correct copy of certain excerpts of the March 10, 2021 Rule 30(b)(6) deposition of Hai Wang.
9. Attached hereto as **Exhibit 8** is a true and correct copy of certain excerpts of the March 11, 2021 Rule 30(b)(6) deposition of Hai Wang.
10. Attached hereto as **Exhibit 9** is a true and correct copy of certain excerpts of the March 25, 2022 deposition of Dr. Lauren Stiroh.
11. Attached hereto as **Exhibit 10** is a true and correct copy of certain excerpts of the February 24, 2022 deposition of Mr. Timothy Kosty.
12. Attached hereto as **Exhibit 11** is a true and correct copy of the Supplemental Expert Report of Dr. Rena Conti dated December 1, 2023.

Executed this 12th day of February, 2024.

/s/ John R. Davis
SLACK DAVIS SANGER, LLP
6001 Bold Ruler Way, Suite 100
Austin, TX 78746
Tel.: 512-795-8686
Fax: 512-795-8787
jdavis@slackdavis.com